

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

**TAMMIE HILL, et. al.**

CASE NO 3:17-cv-00678

PLAINTIFFS

JUDGE CAMPBELL

- VS. -

WINNEBAGO INDUSTRIES, INC.

NOTICE OF DEPOSITION OF  
WITNESS STEVE MARY

DEFENDANT

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Please take notice that Plaintiffs, Tammie Hill and Daniel Hill, will take the telephonic deposition listed below pursuant to Rule 26 of the Federal Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by the law to administer oaths.

<u>Deponent</u>	<u>Location</u>	<u>Date/Time</u>
Steve Mary	Telephonic Deposition	September 7, 2018 at 9:00am (CST)

The examination will continue from time-to-time and from day-to-day until completed.

The deponent(s) will bring the documents described on Schedule A attached hereto and incorporated herein for inspection and copying and examination thereon and will respond to this request for the production of documents as provided in Civil



Rule 34. As used in Schedule A and in this notice, the term "documents" means all items in the possession of or under the control of the deponent(s), or of their agents, attorneys, friends, relatives, employers or employees, which are letters, notes, correspondence, memoranda, pamphlets, books, written or printed matter of any kind, carbon copies, photocopies, tape recordings, transcriptions of tape recordings, photographs, videotapes, records, statements, negotiable instruments or copies thereof, accounting records or any other tangible item containing information of any sorts or upon any subject. In addition, "documents" shall include anything attributed to it under Civil Rule 34 or any case construing that rule. "Person" and "persons" mean natural persons, corporations, partnerships, associations, joint ventures, and all other types of legal or juridic entities. "Vehicle" means the motor vehicle which is the subject of this lawsuit. "You" means the deponent(s), or anyone acting at your request or instruction or otherwise on your behalf.

Respectfully submitted,

/s/ Ronald L. Burdge  
RONALD L. BURDGE  
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## CERTIFICATION OF SERVICE

This will certify that a true and accurate copy of Plaintiffs' *Notice of Deposition of Steve Mary* was served upon Benjamin Reese & Kaley Bell, Leitner, Williams, Dooley & Napolitan, PLLC, 200 W Martin Luther King Boulevard, Chattanooga TN 37402, counsel for Defendant Winnebago, on August 27, 2018, electronically by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Ronald L. Burdge  
RONALD L. BURDGE Pro Hac  
Attorney for Plaintiffs

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## SCHEDULE A

1. Your complete file on this matter;
2. All videos, recordings, and photographs taken by you at any inspection of the RV in this case;
3. All documents you have reviewed which are related to any opinion or report you have made, or given in this case;
4. All books, articles or other authorities which you consulted or relied upon in formulating any opinion you have about this matter or the vehicle which is the subject of this case;
5. All correspondence and email communications and records of communications which you have sent or received to or from Winnebago which is related to the subject RV in any manner.